

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA



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Application of the North American Numbering
Plan Administrator, on behalf of the California
Telecommunications Industry, for Relief of the
323 Numbering Plan Area

A.15-11-017
(Filed November 24, 2015)

**MOTION OF AT&T CALIFORNIA (U 1001 C), NEW CINGULAR WIRELESS
PCS, LLC (U 3060 C), CENTURY LINK COMMUNICATIONS, LLC (U 5335 C),
T-MOBILE WEST LLC d/b/a T-MOBILE (U 3056 C), SPRINT SPECTRUM, L.P.
(U 3064 C), SPRINT COMMUNICATIONS, L.P. (U 5112 C), CELLCO
PARTNERSHIP d/b/a VERIZON WIRELESS (U 3001 C), AND MCI
COMMUNICATIONS SERVICES INC. (U 5378 C) FOR PARTY STATUS**

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July 12, 2016

I.

INTRODUCTION

Pursuant to Public Utilities Commission Rule 1.4 of the California Public Utilities Commission's ("Commission") Rules of Practice and Procedure, AT&T California, New Cingular Wireless PCS, LLC, Century Link Communications LLC, T-Mobile West LLC d/b/a T-Mobile, Sprint Spectrum L.P., Sprint Communications L.P., Cellco Partnership d/b/a Verizon Wireless, and MCI Communications Services Inc. (collectively, the "Joint Carriers") respectfully request party status in this proceeding.

II.

MOTION

A. **The Joint Carriers' Interests in This Proceeding**

The Joint Carriers have an interest in this proceeding because any Commission decision on the Proposed Decision ("PD") will impact the Joint Carriers. On November 24, 2015, the North American Numbering Plan Administration ("NANPA") filed the above-referenced application requesting a boundary elimination overlay for relief of the 323 Numbering Plan Area ("NPA"). The Application sought a 13-month implementation schedule and included a consensus statement from the industry asking the Commission to refrain from ordering a funded Public Education Plan ("PEP"), instead allowing the industry to work together as a committee to develop customer education materials and methods. On July 1, 2016, the Commission issued the PD in this proceeding which approves the boundary elimination overlay for the 323/213 NPA. The PD adopted a 10-month implementation schedule and ordered a more extensive, funded PEP in conflict with the industry consensus statement and request in the NANPA Application. (PD at 1, 17-19). In this proceeding, the Commission's decision to approve or deny the PD will impact

the Joint Carriers as they must expend financial and human resources to implement the Commission's decision.

B. The Factual and Legal Contentions the Joint Carriers Intend to Make.

The Joint Carriers request an opportunity to provide comments to the PD, and request in their proposed Comments that the PD be modified to extend the implementation schedule to 13 months and to otherwise modify the PEP as outlined in the Comments (and consistent with the original NANPA Application).

The PD provides that because “[t]his is an uncontested matter in which the decision grants the relief requested,” “pursuant to Section 311(g)(2) of the Public Utilities Code and Rule 14.6(c)(2), the otherwise applicable 30-day period for public review and comment is waived.” (PD at 22). The Joint Carriers respectfully disagree with that characterization of the PD and request an opportunity to provide comments.

In particular, the Joint Carriers – who categorically support the need for this overlay - seek to extend the implementation period to the more typical 13-month schedule and to otherwise modify the PEP to conform it with industry practice and experience. This is consistent with the initial NANPA Application which the PD ostensibly approves. The 10-month implementation schedule imposed by the PD is inconsistent with past schedules utilized when implementing overlays in California. As such it poses unnecessary risks to public safety as affected stakeholders (including carriers, alarm companies, first responders) may not have sufficient time to complete the necessary steps to transition to 10-digit dialing by the start of the mandatory dialing period. In addition, the PEP set forth in the PD is inefficient and unnecessarily resource intensive. Industry experience has shown that a funded PEP like the one in the PD is wasteful and unnecessary, especially given the industry's extensive experience in

implementing overlays throughout the country for the past 10+ years. In that time, the Industry has developed effective and efficient programs to ensure that consumers are educated about the impact of an overlay and the way they use their phones.

III.

CONCLUSION

For the reasons stated above, the Joint Carriers respectfully urge the Commission to grant this Motion for Party Status to allow the Joint Carriers to file their Motion to File Comments and to file Comments on the PD so that the Commission has the full benefit of industry's input on the implementation of the 323/213 boundary elimination overlay.

Dated: July 12, 2016

Respectfully submitted,

On behalf of Joint Carriers

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